

**Tab 6 to Appendix of Exhibits to Motion of Defendant Brush Wellman, Inc. for Summary Judgment:**

**SUZANNE GENEREUX DEPOSITION EXCERPTS**

Volume: I Pages: 1-268 Exhibits: 1-12

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF MASSACHUSETTS

Civil Action No. 04-CV-12137 JLT

- - - - - x

SUZANNE GENEREUX and BARRY GENEREUX, Individually  
and as Parents and Natural Guardians of their minor  
children, ANGELA GENEREUX AND KRISTA GENEREUX,  
Plaintiffs,

v.

AMERICAN BERYLLIA CORP., BRUSH WELLMAN, INC., BRUSH  
WELLMAN CERAMICS, INC., BRUSH WELLMAN CERAMIC  
PRODUCTS, INC., HARDRIC LABORATORIES, INC., KYOCERA  
AMERICA, INC., KYOCERA INDUSTRIAL CERAMICS CORP.,  
and RAYTHEON COMPANY,  
Defendants.

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VIDEOTAPED DEPOSITION OF SUZANNE GENEREUX

Wednesday, February 15, 2006, 9:16 a.m.

MEEHAN, BOYLE, BLACK & FITZGERALD

Two Center Plaza, Suite 600

Boston, Massachusetts

Reporter: Marianne R. Wharram, CSR/RPR

Page 18

1 A. P something or other.  
 2 Q. Okay. Did Raytheon require you to have a  
 3 chest x-ray --  
 4 A. No.  
 5 Q. -- before you started working?  
 6 A. Not that I -- no. I don't remember  
 7 anything that -- you know, it was just a simple  
 8 physical; asked your background and I told him.  
 9 Q. Did they give you any kind of a lung test?  
 10 A. No.  
 11 Q. Now, is it -- is it correct that your first  
 12 job at the Waltham plant was large power tube parts  
 13 assembler? Does that sound right?  
 14 A. It was in the same lab, so just -- I really  
 15 don't know what the na-- the title exactly was. It  
 16 was this one BWO lab that we worked in.  
 17 Q. What was the name of the lab?  
 18 A. A BWO lab, backward wave oscillator.  
 19 Q. B-W-O?  
 20 A. Yes.  
 21 Q. What is a backward wave oscillator?  
 22 A. I have no clue.  
 23 Q. Is that what the lab was making?  
 24 A. I believe so. That's the name of the lab

Page 19

1 that they tell us to go to, so.  
 2 Q. Was it your understanding that the things  
 3 being made in this lab were being made for the U.S.  
 4 government?  
 5 A. That's what I was told by people who worked  
 6 there, by coworkers, that, you know, this was just  
 7 stuff that they were making.  
 8 Q. They were making for the government,  
 9 correct?  
 10 A. To the best of my knowledge, that's what  
 11 they had -- you know.  
 12 Q. This was military equipment that they were  
 13 making?  
 14 A. Nobody really specified it. They just  
 15 pretty much said, you know, that some of the things  
 16 that we were doing in that lab had to do with, you  
 17 know, their different systems, whatever they were  
 18 making at the time.  
 19 Q. Do you know if these were radar systems?  
 20 A. I haven't got a clue.  
 21 Q. Did you have to get any kind of a security  
 22 clearance to work there?  
 23 A. No.  
 24 Q. Did you ever get a security clearance?

Page 20

1 A. Ever?  
 2 Q. During your years at Raytheon, '82 to '90?  
 3 A. No.  
 4 Q. You never got a security clearance?  
 5 A. Hmm-mm.  
 6 Q. Did you ever apply for a security  
 7 clearance?  
 8 A. No.  
 9 Q. Did anyone ever tell you that you needed a  
 10 security clearance?  
 11 A. No.  
 12 Q. Who was your supervisor in that first job  
 13 in the BWO lab?  
 14 A. Can't remember his name. It starts getting  
 15 -- I remember later, but -- I remember seeing the  
 16 guy, very tall and lanky, but I don't recall his  
 17 first name.  
 18 Q. How long did you work in that lab? Was  
 19 that the whole eight years?  
 20 A. Except for the last year or so. Then I was  
 21 in quality assurance, or quality control.  
 22 Q. What was your job in the lab?  
 23 A. To -- to assemble subassemblies.  
 24 Q. Okay. Is that all?

Page 21

1 A. That entailed, you know, assembling them  
 2 per print, by specs.  
 3 Q. First of all, what do you mean by a  
 4 subassembly? What is that?  
 5 A. Well, I guess the easiest way to put it is  
 6 I don't know where the end product was going, so we  
 7 just knew -- I made it and then part A gets sent  
 8 out to place B, and it goes on from there.  
 9 Q. Well, can you describe for us the various  
 10 steps that you performed in the assembly process?  
 11 A. On different -- there was different parts.  
 12 Everyone had different names for the items you were  
 13 making. An example would be an ARCO window, which  
 14 was what I did most of the time.  
 15 Q. What kind of a window?  
 16 A. They spelled it A-R-C-O.  
 17 Q. Okay.  
 18 A. And basically, the parts either came  
 19 kitted, or you had to go and get the parts. You  
 20 were given a total amount to make. You put the  
 21 pieces together. You make -- you make sure the  
 22 identification of each part is per print, then you  
 23 will file to fit, and then you will put it -- mount  
 24 it into a fixture. That fixture goes to brazing.

Page 22

1 When you get the part in 24 hours, it is now a  
 2 subassembly. You remeasure it to make sure that  
 3 assembly is to size, to print.  
 4 Q. Was that the last step, or was there also  
 5 some cleaning?  
 6 A. Well, in the process sheet, it would tell  
 7 you different steps that you had to do. If your  
 8 process sheet called for sandblasting of the virgin  
 9 window, then you would sandblast the window prior  
 10 to the brazing, then you would -- we were required  
 11 to re-- resandblast after it came up and it had  
 12 been leak checked and it was found to be acceptable  
 13 to go to the next step.  
 14 Q. So there could be several sandblasting  
 15 steps in the assembly process?  
 16 A. Oh, definitely.  
 17 Q. You said most of the time that you worked  
 18 in the lab was -- was spent on these ARCO windows;  
 19 is that right?  
 20 A. Right.  
 21 Q. What percentage of the time, roughly, would  
 22 you say?  
 23 A. A good 80 percent of my day.  
 24 Q. For the whole seven-year period or so?

Page 23

1 A. That -- there was other assemblies, so you  
 2 had like small ones. You might -- there was a tall  
 3 man. I don't know. It had a number to it, had a  
 4 rectangular about an inch thick beryllium ceramic  
 5 that's used to make it. I don't know. We only did  
 6 a few of those.  
 7 Q. Okay. All right. Was -- well, were there  
 8 other people who were doing the same assembly as  
 9 you at the same time?  
 10 A. No. There was someone who trained me when  
 11 I first started, and then he retired.  
 12 Q. Who was that?  
 13 A. Bob Blood.  
 14 Q. Flood, is it?  
 15 A. Blood.  
 16 Q. Blood? Okay. But you were the only person  
 17 for that whole period of time who was assembling  
 18 the ARCO window?  
 19 A. Yes.  
 20 Q. Were there other people who worked in the  
 21 same lab?  
 22 A. There was other people in the same lab.  
 23 Q. How many people worked in that lab?  
 24 A. I don't know offhand. I'm going to

Page 24

1 estimate somewhere about 20 to 30.  
 2 Q. Okay. Were there other people who were  
 3 working with beryllium oxide parts in the lab?  
 4 A. Yeah, different stages. The tall -- you  
 5 know, sometimes my first assembly would go on to  
 6 somebody else.  
 7 Q. Okay. Do you remember the names of some of  
 8 the other people who worked with you in that lab?  
 9 A. Not the full name; maybe first name. You  
 10 know, I mean, most of the time you're working, you  
 11 don't know everyone's first and last name.  
 12 Q. Okay. Have you kept up a friendship with  
 13 any of the people that you've worked with?  
 14 A. Not really.  
 15 Q. Okay. When did Bob Blood give you the  
 16 training that you mentioned?  
 17 A. 1982.  
 18 Q. Okay. The first day you showed up for  
 19 work?  
 20 A. Mm-hmm.  
 21 Q. Tell us what you remember about the  
 22 training.  
 23 A. He explained what a bastard file was and  
 24 explained to me how to use it to remove just enough

Page 25

1 metal to make them meet, you know. He explained to  
 2 me what Eutectic was, which is the brazing  
 3 compound; you know, explained simply where to get  
 4 the parts and where to get the fixtures and how to  
 5 put it together.  
 6 Q. Did he say anything to you about any health  
 7 hazards from the material you were working with?  
 8 A. No.  
 9 Q. No?  
 10 A. No.  
 11 Q. Did he say anything about beryllium or  
 12 beryllium oxide?  
 13 A. No, just that the print showed a beryllium  
 14 ceramic, so he just showed me where to go to fetch  
 15 my pieces.  
 16 Q. But he didn't tell you that there was any  
 17 danger associated with beryllium oxide?  
 18 A. No.  
 19 Q. Did you know, when you started working at  
 20 Raytheon with these parts, that there is a health  
 21 risk associated with beryllium?  
 22 A. No.  
 23 Q. No? Did Mr. Blood tell you about any  
 24 equipment that you should use to protect yourself

Page 26

1 from breathing in beryllium oxide dust?  
 2 A. No.  
 3 Q. Did he give you a respirator?  
 4 A. No.  
 5 Q. Did he say anything about using a  
 6 respirator?  
 7 A. No. When he was sandblasting, he didn't  
 8 use one. He just showed me where it was and how to  
 9 use it.  
 10 Q. Okay. Did you do the brazing yourself, or  
 11 was that --  
 12 (Witness gesturing.)  
 13 Q. No? That was done in a separate --  
 14 A. It's a very hot oven. You just -- you  
 15 transported -- you know, you walk the units down.  
 16 You transport it to the oven room and they took it  
 17 from there. You went back and fetched your parts  
 18 in the morning.  
 19 Q. You mentioned using a bastard file. Can  
 20 you describe what you did with the file?  
 21 A. A little tiny file.  
 22 Q. A little tiny file? And what were you  
 23 filing?  
 24 A. The copper -- the beryllium copper

Page 27

1 sleeveings that you had to -- they had to meet just  
 2 right into the stainless steel pieces.  
 3 Q. Were you also filing any beryllium oxide  
 4 parts, or was it only the beryllium copper?  
 5 A. I don't -- I don't recall any filing. We  
 6 had a lot of sandblasting to do with the ceramic,  
 7 because if you file a ceramic, you can damage it.  
 8 Q. Okay. When you used the bastard file on  
 9 beryllium copper, did that ever create any dust  
 10 that you could see?  
 11 A. Not that you can really see. I mean, it is  
 12 a very fine file and you're doing very -- very  
 13 close, because the tolerances are close.  
 14 Q. When you showed up for work in 1982, did  
 15 you get any kind of orientation other than what  
 16 Mr. Blood gave you?  
 17 A. What do you mean?  
 18 Q. Did Raytheon give you any kind of  
 19 introduction to the job, tell you what you would be  
 20 doing and so on and so forth?  
 21 A. No.  
 22 Q. No? You came to work the first day and  
 23 went straight to meet with Mr. Blood? Is that how  
 24 it worked?

Page 28

1 A. You went to your lab and the supervisor  
 2 said sit here and here's Bob and welcome.  
 3 Q. Bob will show you what to do?  
 4 A. That's it.  
 5 Q. So before you started working, Raytheon  
 6 didn't give you any information of any kind about  
 7 any health risks that you might -- might be facing?  
 8 A. No.  
 9 Q. And Raytheon didn't give you any training  
 10 of any kind about how to work safely with beryllium  
 11 or beryllium oxide?  
 12 MR. HONIK: Object to the form of the  
 13 question. You can answer, Suzy. Do you remember  
 14 his question?  
 15 Q. (BY MR. UBERSAX) I'll ask it again.  
 16 A. Go ahead.  
 17 MR. HONIK: Just by way of instruction  
 18 to you, from time to time, I may place an objection  
 19 on the record. You needn't concern yourself with  
 20 my objection, unless I instruct you otherwise, but  
 21 I'm protecting the record in doing so.  
 22 A. Sorry. Go ahead.  
 23 Q. (BY MR. UBERSAX) I'll ask again. Before  
 24 you started working in the lab with beryllium oxide

Page 29

1 and beryllium copper, did Raytheon give you any  
 2 training about how to protect yourself against any  
 3 health risk from beryllium?  
 4 A. No.  
 5 Q. Before you started working with beryllium  
 6 oxide and beryllium copper at Raytheon, did the  
 7 company give you any information at all about any  
 8 health risk from beryllium?  
 9 A. No.  
 10 Q. During your whole time at Raytheon, from  
 11 1982 to 1990, did the company ever tell you  
 12 anything about chronic beryllium disease?  
 13 A. No.  
 14 Q. Did the company ever tell you during those  
 15 eight years that exposure to beryllium could be  
 16 harmful to a person's health?  
 17 A. No.  
 18 Q. Did Raytheon ever tell you that beryllium  
 19 can cause lung disease?  
 20 A. No.  
 21 Q. Did the company ever show you a videotape  
 22 about the risks of beryllium?  
 23 A. No.  
 24 Q. Did you ever go to a presentation by

Page 30

1 anybody from Brush Wellman about beryllium?

2 A. No.

3 Q. Did you -- did you attend a presentation by

4 anybody from any company --

5 A. No.

6 Q. -- about beryllium?

7 A. No.

8 Q. No?

9 A. No.

10 Q. Did you ever see -- well, let me back up.

11 Do you know what a material safety data sheet is?

12 A. I have heard of them, but we weren't privy

13 to anything. You know, we didn't have anything.

14 Q. Where have you heard of them?

15 A. Just after the fact. I mean --

16 Q. Okay. You never heard of one when you were

17 at Raytheon?

18 A. No.

19 Q. No one ever mentioned material safety data

20 sheets to you?

21 A. No.

22 Q. No one ever showed you a material safety

23 data sheet for any material containing beryllium?

24 A. No.

Page 31

1 Q. No?

2 A. No.

3 Q. No one ever told you that if you wanted to

4 see a material safety data sheet for beryllium

5 oxide or beryllium copper, you could go to a

6 certain place and they were there?

7 A. No.

8 Q. Did -- was there a human resources

9 department at Raytheon? Do you know?

10 A. I believe that's the people who hire you.

11 Q. Okay. And was there -- in that department,

12 was there a safety office? Do you know?

13 A. I don't recall any.

14 Q. Okay. Did Raytheon ever give you any kind

15 of a document that talked about any health risk of

16 beryllium?

17 A. No.

18 Q. Did anyone at Raytheon tell you that the

19 Federal Occupational Safety and Health

20 Administration has a regulation that limits the

21 amount of beryllium that can be in the air at a

22 workplace?

23 A. No.

24 Q. Did you ever hear of the -- the figure two

Page 32

1 micrograms per cubic meter --

2 A. No.

3 Q. -- of beryllium? Excuse me; per cubic

4 meter of air. You never heard anyone talk about a

5 federal limit or a federal standard? No?

6 A. No.

7 Q. And no one ever told you that -- that if

8 exposures were kept below a certain limit, that --

9 that beryllium -- exposure to beryllium were safe?

10 A. No.

11 Q. Do you know whether Raytheon took any

12 measurements of beryllium in the air at the Waltham

13 plant?

14 A. Not to my knowledge.

15 Q. Did you ever see any kind of device in your

16 work area that was -- that was sampling the air?

17 A. At -- yes, just when I went -- at the end,

18 when I went into QC. I don't -- I wasn't working

19 in the lab any more, okay, because I was at a

20 different section. There was somebody -- because

21 they changed the lab to what they called a clean

22 room, so they had people wearing bonnets, and I

23 know that they would wheel in a machine, but I

24 don't know what -- exactly what they were

Page 33

1 measuring.

2 Q. Okay. That was in the QC department?

3 A. No. That -- the lab that I worked in

4 changed.

5 Q. Okay.

6 A. When I left and I went to QC, the lab was

7 switched to a clean room lab.

8 Q. All right.

9 A. But I didn't work there. I was no longer

10 in that room.

11 Q. Okay. When did that switch take place?

12 A. You know, it was after I was in QC. I

13 would say approximately 1989; late 1988, maybe.

14 Q. Were they still doing the same kinds of

15 work in that lab after you left?

16 A. I had left the room. To the best of my

17 knowledge, there were people still doing it, but I

18 don't really recall, because I wasn't in there.

19 Q. What kinds of things did Raytheon do to

20 make it a clean room?

21 A. I have no clue. I wasn't working in the

22 room at the time.

23 Q. Well, what did you observe that was

24 different about the room?



Page 34

1 A. Just that people wore bunny suits.  
 2 Q. Bunny suits? Okay. Were they wearing  
 3 respirators?  
 4 A. No.  
 5 Q. Did you ever -- when you say a bunny suit,  
 6 what do you mean? A full set of clothing, top to  
 7 bottom?  
 8 A. Uh, some -- some had full sets. Some had  
 9 just protective things over their shoes, and they  
 10 were given like yellow smocks and hair nets, you  
 11 know.  
 12 Q. Well, what were most of the people wearing?  
 13 When you say bunny suits, what are you --  
 14 A. There was a few people that I would see.  
 15 They now had like a vacuum locker or whatever they  
 16 call it, like another room, so they would be  
 17 changing and putting things in lockers, like taking  
 18 off the smocks, and some people had zippered  
 19 outfits, but I don't -- you know, you would just be  
 20 passing by. I mean, your job wasn't even there, so  
 21 --  
 22 Q. So you're -- you're -- what you mean by a  
 23 bunny suit is a zippered outfit that goes --  
 24 A. Yeah, like a hood.

Page 35

1 Q. -- that cover a person's street clothes?  
 2 A. Yes.  
 3 Q. So a set of work clothing that covers  
 4 street clothing?  
 5 A. Right.  
 6 Q. Did you ever have to wear a bunny suit --  
 7 A. No.  
 8 Q. -- or any work clothing at Raytheon?  
 9 A. No.  
 10 Q. Now, did Raytheon ever provide you with a  
 11 set of work clothes?  
 12 A. No.  
 13 Q. They never required you to wear any special  
 14 clothing when you worked with beryllium or  
 15 beryllium oxide?  
 16 A. No.  
 17 Q. So in other words, you wore your street  
 18 clothes in the lab --  
 19 A. Mm-hmm.  
 20 Q. -- and during the whole working day?  
 21 A. Mm-hmm.  
 22 Q. And you went home with the same set of  
 23 clothes on?  
 24 A. Mm-hmm.

Page 36

1 Q. And the company didn't require you to take  
 2 a shower at the end of the workday?  
 3 A. No.  
 4 Q. Did the company even have shower  
 5 facilities?  
 6 A. No, not that I know of.  
 7 Q. When you went home at the end of the day,  
 8 did you ever notice that your clothing was dusty or  
 9 --  
 10 A. Oh, yeah.  
 11 Q. Can you describe what it looked like?  
 12 A. It's a very fine whitish material that you  
 13 would just shake it out.  
 14 Q. You would shake it out?  
 15 A. Yeah.  
 16 Q. Okay. Where would you shake it out?  
 17 A. Sometimes in the basement.  
 18 Q. Was that before you would launder it?  
 19 A. Sometimes, yeah.  
 20 Q. And when you -- when you shook it out,  
 21 would there be a visible cloud of dust?  
 22 A. Not that I could really -- I mean, you  
 23 know, you vacuum on a regular basis, so you just  
 24 automatically -- whatever was down there,

Page 37

1 eventually I picked it up. To say that I could  
 2 actually see a pile of it, no.  
 3 Q. Not a pile, but when you -- you said  
 4 sometimes you would shake -- shake out the clothes?  
 5 A. Yeah.  
 6 Q. When you did that, would there be some  
 7 visible dust in the air from the shaking?  
 8 A. Probably. I don't really recall. I mean,  
 9 usually, I was just in a hurry and, you know, tried  
 10 to hurry up and get it done.  
 11 Q. Did you ever talk with anyone at Raytheon  
 12 about this whitish material on your clothing?  
 13 A. No.  
 14 Q. At the time, what was your understanding  
 15 about what that was?  
 16 A. Part of the job.  
 17 Q. Okay. But you didn't have any  
 18 understanding of what -- what the composition of  
 19 that whitish dust was?  
 20 A. Part of it would be whatever the material  
 21 I'm sandblasting.  
 22 Q. Did you think that that whitish material on  
 23 your clothes was beryllium oxide or --  
 24 A. Not really.

Page 38

1 Q. Okay. When did you first learn that  
2 beryllium oxide or beryllium copper can be  
3 dangerous to human health?  
4 A. I first -- well, I didn't know it was  
5 dangerous to human health. I was just directed  
6 through the Department of Labor to go to National  
7 Jewish to have this test.  
8 Q. When you left Raytheon in 1990, did you  
9 know at that time that beryllium presents any kind  
10 of a risk to human health?  
11 A. No.  
12 Q. When I say beryllium, that includes  
13 beryllium oxide, beryllium copper and all forms of  
14 beryllium, right? You had no idea that those  
15 things --  
16 A. Not a clue.  
17 Q. -- had presented any risk to you at all?  
18 A. No.  
19 Q. All right. I want to go back to your  
20 statement about the Department of Labor.  
21 A. Mm-hmm.  
22 Q. What happened with the Department of Labor?  
23 A. I was told to call them through Jack Reed's  
24 department, Senator Jack Reed.

Page 39

1 Q. Senator Jack Reed's office called you?  
2 A. I had written him a letter, because I  
3 wanted to find out what I could do to get my long  
4 term disability back.  
5 Q. Okay. Have you kept a copy of that letter?  
6 Do you know?  
7 A. I don't remember if I did or not.  
8 Q. What did the letter say?  
9 A. Just that I was upset, I had had a stroke,  
10 and I felt that I wanted to understand why Raytheon  
11 had taken my long-term disability.  
12 Q. You had a stroke in 1996; is that right?  
13 A. Mm-hmm.  
14 Q. Was that during your visit to Disney World?  
15 A. Yes.  
16 Q. What -- did you see a heart doctor in  
17 connection with that?  
18 A. I really don't recall like the first six  
19 months, you know, immediately afterwards.  
20 Q. Okay. Well, we'll get back to that. Let's  
21 go back to the letter to -- to Senator Reed. Did  
22 you get a letter back from his office, or was it a  
23 phone call, or what happened?  
24 A. He had sent -- I believe he said it with

Page 40

1 the letter, to call his office, and he -- they  
2 asked if I had ever been tested for CBD, which I  
3 had never heard of, and they told me I should  
4 contact the Department of Labor in Washington, and  
5 he gave me the number.  
6 Q. Okay. When you say they asked you, who was  
7 --  
8 A. Senator Reed's office.  
9 Q. Of course, you don't remember who?  
10 A. No.  
11 Q. So how did the whole question of beryllium  
12 come up in this conversation?  
13 A. I don't really recall. It had to do with  
14 my -- my letter. I wrote to them and I told them  
15 where I had worked and that I just -- I thought  
16 that it was wrong that Raytheon had taken my long  
17 term disability, and I wanted to find out how to  
18 get it back.  
19 Q. Did your letter say anything about  
20 beryllium?  
21 A. I don't believe so.  
22 Q. Okay. Why had you been put on long term  
23 disability? What had disabled you?  
24 A. I had a high risk pregnancy at first, and

Page 41

1 it was followed by other health issues.  
2 Q. What were those health issues?  
3 A. I had carpal tunnel.  
4 Q. And in fact, you had surgery on both hands  
5 for that?  
6 A. Yes.  
7 Q. And then after -- and that, of course,  
8 prevented you from working?  
9 A. Mm-hmm.  
10 Q. Yes?  
11 A. Yes.  
12 Q. And then after the carpal tunnel surgeries,  
13 you were then diagnosed with Parkinsonism, correct?  
14 A. Right. My right hand had never come back  
15 to the full capacity, even with physical therapy.  
16 Q. Okay. And did that -- that also kept you  
17 from working, the Parkinsonism?  
18 (Witness gesturing.)  
19 Q. So you felt that your long term -- that you  
20 should be put on and kept on long term disability  
21 because of the Parkinson's disease?  
22 A. Mm-hmm.  
23 Q. Yes?  
24 A. Yes.



Page 42

1 Q. Did the representative of Senator Reed ask  
2 you questions about -- about your workplace?  
3 A. I don't recall the entire conversation.  
4 Q. I'm just trying to get at how the subject  
5 of beryllium came up at all.  
6 A. It is -- it is such a long time ago. I  
7 just recall him -- I just recall the girl saying is  
8 that the Waltham plant, and I said yes, but to say  
9 exactly, you know, I just remember getting the  
10 number. I would have never thought of the labor  
11 department in Washington. She gave me the number,  
12 and from there, they told me about National Jewish  
13 and that I should call them, which I did, and  
14 that's it.  
15 Q. Had you ever heard of chronic beryllium  
16 disease before this conversation with Senator  
17 Reed's office?  
18 A. No.  
19 Q. Did you ask them, you know, what is chronic  
20 beryllium disease?  
21 A. Yeah.  
22 Q. And did she say anything about that?  
23 A. No. She just told me that I needed to call  
24 the labor department.

Page 43

1 Q. After that call, did you go out and try to  
2 get some information about chronic beryllium  
3 disease?  
4 A. I tried to understand what people were  
5 trying to send me for. They sent me for a blood  
6 test.  
7 Q. Okay.  
8 A. And that was the first thing, but.  
9 Q. Did you do any research or reading about  
10 chronic beryllium disease, which you'd never heard  
11 of before?  
12 A. I don't recall doing it at that point,  
13 because it was just a blood test, and my doctor  
14 arranged it. You know, I mean, we just had to get  
15 the --  
16 Q. Was that Dr. Ashley?  
17 A. Yes.  
18 Q. Did you -- you called him to arrange the  
19 blood test after this phone call with Senator Reed?  
20 A. No, National Jewish.  
21 Q. You called --  
22 A. Yeah, National Jewish people sent a  
23 container --  
24 Q. Okay.

Page 44

1 A. -- and a procedure, and then that had to  
2 arrive.  
3 Q. Right.  
4 A. And then I had to go to Dr. Ashley's, and  
5 they had to arrange between -- something about  
6 Colorado with the timing and whatnot, and then  
7 after the blood was taken, I had to take it to  
8 FedEx.  
9 Q. Did the person from Senator Reed's office  
10 tell you that chronic beryllium disease is a lung  
11 disease?  
12 A. No.  
13 Q. When did you first learn that chronic  
14 beryllium disease is a lung disease?  
15 A. When I was -- af-- after the second test  
16 came back positive and National Jewish people --  
17 Heather Davis had called and told me the next step  
18 would be a lung biopsy.  
19 Q. Okay. Didn't you ask -- when you went in  
20 for the -- for the -- to Dr. -- you went to  
21 Dr. Ashley's office to have a blood sample taken?  
22 A. Right.  
23 Q. Is that right? And did you talk with  
24 Dr. Ashley when you went in for that visit?

Page 45

1 A. No.  
2 Q. No?  
3 A. Went right into the little lab that's in  
4 his office. They had already gotten all the  
5 instructions, you know, and all I knew was the girl  
6 told me, you know, well, they must do this because  
7 you were exposed to beryllium, you know, and we  
8 just went ahead with that and didn't know what --  
9 just knew that okay, I'm having this test because I  
10 was exposed. Okay, I know I was exposed, but to  
11 say that I knew any outcome, no.  
12 Q. Did Senator Reed's office tell you anything  
13 about the symptoms of chronic beryllium disease or  
14 what it can do to a person?  
15 A. No.  
16 Q. After you had this phone call with -- with  
17 Senator Reed's office --  
18 A. Mm-hmm.  
19 Q. -- were you concerned that exposure to  
20 beryllium at the Raytheon plant may have caused  
21 some of your health problems?  
22 A. I was shocked that -- that they had said  
23 that there was something that could have happened  
24 from working there, but you know, other than that,

Page 46

1 I just called the labor department and then  
 2 National Jewish.  
 3 Q. Okay. So you decided to follow up and  
 4 investigate whether exposure to beryllium had had  
 5 some effect on you, right?  
 6 A. Yeah.  
 7 Q. How much time was there between the phone  
 8 call with Senator Reed's office and the -- the  
 9 blood draw at Dr. Ashley's office?  
 10 A. Oh, I'm not really sure. I'm going to  
 11 estimate. Somewhere six to nine months, maybe.  
 12 Q. Okay. Why did it take so long?  
 13 A. I have no idea. By the time they got the  
 14 sample box down to Dr. Ashley's office and they  
 15 arranged that, you know --  
 16 Q. Did -- how long after the call with Senator  
 17 Reed's office did you call the Department of Labor?  
 18 A. Oh, probably maybe -- I tried a few times.  
 19 The line is like always -- nobody answers. You  
 20 know, it's a -- you leave a message, and I think  
 21 you had to leave your name or something, and then  
 22 it took a while before they actually called me  
 23 back. And then they basically took down some  
 24 information, and from there, they just directed you

Page 47

1 to the next step, you know, and that was it. I  
 2 mean --  
 3 Q. Was that within a few weeks of your --  
 4 A. I believe it was, but I'm not really sure.  
 5 Q. -- your phone call with Senator Reed? And  
 6 then how long did it take to make contact with  
 7 National Jewish after that?  
 8 A. It took a little bit of time to get  
 9 through, because again, you had to leave your name  
 10 and number, and you know, Heather got back to you.  
 11 And when she did, you know, I don't really recall  
 12 exactly. I'm going to say a couple of weeks tops,  
 13 you know, and then it was waiting for the box to  
 14 arrive and --  
 15 Q. Did Raytheon ever require you to wear a  
 16 face mask when you worked with beryllium?  
 17 A. No.  
 18 Q. Did Raytheon ever require you to wear a  
 19 respirator?  
 20 A. No.  
 21 Q. Did Raytheon ever say you could wear a  
 22 respirator if you wanted to?  
 23 A. No.  
 24 Q. Were respirators available to the workers

Page 48

1 in this lab?  
 2 A. I never saw any. I don't recall if they  
 3 were.  
 4 Q. Okay. Did you ever go through a process to  
 5 get some kind of a medical clearance to let you use  
 6 a respirator?  
 7 A. No.  
 8 Q. How about gloves? Did Raytheon ever  
 9 require you to wear gloves when you were handling  
 10 beryllium oxide or beryllium copper parts?  
 11 A. No. The only gloves were rubber gloves  
 12 when you sandblasted.  
 13 Q. Did you ever see any signs or posters at  
 14 Raytheon about beryllium?  
 15 A. No.  
 16 Q. Did you ever see any warning labels on  
 17 packages of beryllium-containing material that came  
 18 in to the Raytheon plant?  
 19 (Witness gesturing.)  
 20 A. Hmm, no.  
 21 Q. Did you ever see any warning labels that  
 22 Raytheon put on to finished products that it sent  
 23 out to its customers?  
 24 A. No, because I never saw real finished

Page 49

1 products. I mean, even -- even after the final  
 2 sandblasting of an ARCO window, I didn't do any  
 3 packaging.  
 4 Q. Okay. How about during the assembly or the  
 5 manufacturing process when a -- when a subassembly  
 6 was being worked on? Did you ever see any tags on  
 7 the subassembly that mentioned a beryllium risk?  
 8 A. No, not that I know of. No.  
 9 Q. Did you ever see any red tags of any kind  
 10 on any Raytheon subassemblies?  
 11 A. No.  
 12 Q. During your years at Raytheon, did the  
 13 company ever give you or require you to get chest  
 14 x-rays?  
 15 A. No.  
 16 Q. Did the company require any kind of medical  
 17 tests?  
 18 A. No.  
 19 Q. Was there any requirement that you get your  
 20 weight taken on a periodic basis?  
 21 A. No.  
 22 Q. No? There was a physician at the plant,  
 23 you mentioned?  
 24 A. Yeah, there was.

Page 50

1 Q. Was he there full-time?  
 2 A. I have no idea.  
 3 Q. Okay. And did you ever see him? I mean,  
 4 did you ever go to talk to him?  
 5 A. Yeah. Yes.  
 6 Q. Okay. How many times did you see him?  
 7 A. I don't recall exactly how many times, but  
 8 each time that I was out of work, to be reentered  
 9 into the job force, you had to go through the  
 10 medical.  
 11 Q. Just to be cleared to work again?  
 12 A. Yeah.  
 13 Q. Okay. And I take it that this -- this  
 14 doctor never had any discussion with you relating  
 15 to beryllium, beryllium oxide, anything like that?  
 16 A. No.  
 17 Q. Were you a union member when you worked at  
 18 Raytheon?  
 19 A. Yes.  
 20 Q. Which union was that?  
 21 A. I want to say 1503, but I might be wrong.  
 22 Q. What's the name of the union?  
 23 A. I don't know. IBW -- you know.  
 24 Q. IBEW?

Page 51

1 A. I think it was 1503.  
 2 Q. Did the union give -- give you any  
 3 information about the health risks of your  
 4 employment at Raytheon?  
 5 A. No.  
 6 Q. Did you always -- was all of your work for  
 7 Raytheon done at the Waltham plant?  
 8 A. No.  
 9 Q. You also went to the Northborough plant for  
 10 a while?  
 11 A. Yes.  
 12 Q. When was that?  
 13 A. I'm really not all that sure.  
 14 Q. Would that have been --  
 15 A. I want to say approximately '84. Weren't  
 16 there that long. We transferred back.  
 17 Q. How long were you there?  
 18 A. I'm not that sure if it was even a full  
 19 year or if it was just over a year.  
 20 Q. What kind of work did you do at  
 21 Northborough?  
 22 A. Quality assurance work, in process.  
 23 Q. Were you working with beryllium over there?  
 24 A. No.

Page 52

1 Q. And when I say beryllium, I mean beryllium  
 2 oxide, beryllium copper, all beryllium.  
 3 A. No.  
 4 Q. You didn't work with anything like that?  
 5 A. No.  
 6 Q. What did you work with over at  
 7 Northborough?  
 8 A. A microscope, and looked at small little  
 9 contact points under a microscope all day checking  
 10 people's work.  
 11 Q. What were those parts made out of? Were  
 12 they metal parts?  
 13 A. Yeah, they were wicked small. Girls had to  
 14 solder under a mic, so you're basically checking  
 15 their alignments and their soldering.  
 16 Q. Do you remember who your supervisor was  
 17 over at Northborough?  
 18 A. No, I don't.  
 19 Q. Let me ask you some questions about the BWO  
 20 lab. Was that -- was that a restricted access  
 21 area?  
 22 A. I don't really know if it was classified as  
 23 anything. I mean, people wouldn't go there unless  
 24 their job was in there.

Page 53

1 Q. Okay. But -- were they prohibited from  
 2 entering unless they worked in that room?  
 3 A. The only people I ever saw go in and out  
 4 were mechanics who were coming in to fix something  
 5 or other, or -- like I say, I never saw anyone just  
 6 hanging around there.  
 7 Q. Okay. Was there any kind of a sign that  
 8 said no entry unless authorized or something like  
 9 that?  
 10 A. No.  
 11 Q. And was the room locked --  
 12 A. No.  
 13 Q. -- so that people couldn't come in?  
 14 A. No.  
 15 Q. You didn't need a key to get in?  
 16 A. Oh, no.  
 17 Q. How big physically was this -- this  
 18 laboratory, roughly? I mean, how many -- how many  
 19 square feet?  
 20 A. A lot bigger than this. Um, I have no  
 21 idea. I may be off a bit. I may say that it was  
 22 like, you know, 40 feet long by, I don't know,  
 23 30 feet wide.  
 24 Q. Okay.

Page 54

1 A. I'm not really sure. It wasn't tiny.  
 2 Q. And what was in that laboratory?  
 3 A. A lot of tables, um, we had welders, uh, we  
 4 had cleaning -- like some cleaning areas where your  
 5 acetone, everything was kept there. Other than  
 6 that, you know, you had a couple of welders. There  
 7 was another department off of it, but I don't know  
 8 exactly what they did there, and you had some QA  
 9 people within the department. Other than that, it  
 10 was just everyone doing different types of  
 11 subassemblies.  
 12 Q. Just on open tables?  
 13 A. Yes.  
 14 Q. Was there any kind of a hood or ventilation  
 15 above the tables?  
 16 A. No. The only place that you had a little  
 17 bit of hood was probably the welder, you know, like  
 18 where you weld, where you're spot welding or arc  
 19 welding.  
 20 Q. All right. Let's talk a little bit about  
 21 that ARCO window that you worked on. Do you know  
 22 what the ARCO stands for, by the way?  
 23 A. No.  
 24 Q. What was the starting piece for that? In

Page 55

1 other words, if you're doing -- if you were putting  
 2 together one of those subassemblies, what would you  
 3 start with?  
 4 A. A bottom flange.  
 5 Q. What's that made out of?  
 6 A. I'm not really sure. It was silver. It  
 7 was either stainless or a nickel, um, you know,  
 8 overall diameter approximately like this, had  
 9 probably six holes drilled in it and a rectangle  
 10 hole on one end, inside.  
 11 Q. What came next?  
 12 A. Then you would have -- there was a sleeving  
 13 that came next. You're going to ask me the kind.  
 14 Um --  
 15 Q. Do you know what that was made out of?  
 16 A. You know, I'm not really sure. It's been a  
 17 long time.  
 18 Q. All right. Well --  
 19 A. I just know it had bosses on it and then  
 20 the top flange. Your ceramic was captured in  
 21 between.  
 22 Q. Okay, so -- but roughly how many pieces  
 23 went into one of these ARCO windows?  
 24 A. Including your -- your brazing compound,

Page 56

1 probably -- there was probably a list of eight or  
 2 nine on the blueprint.  
 3 Q. Yeah. And of those eight or nine pieces,  
 4 how many were -- were made out of beryllium oxide  
 5 or beryllium copper?  
 6 A. The ceramic was a beryllium ceramic.  
 7 Q. Mm-hmm.  
 8 A. That one, I don't recall whether there was  
 9 a copper sleeve on that one or if that was a nickel  
 10 sleeve.  
 11 Q. So one of the pieces was beryllium oxide?  
 12 A. Right. That was my largest diameter  
 13 ceramic.  
 14 Q. What was the size and shape of that ceramic  
 15 piece?  
 16 A. Round; probably, oh, I'm going to say three  
 17 quarters of an inch thick.  
 18 Q. Okay. Was it pure ceramic, or did it have  
 19 metal on it as well?  
 20 A. We knew it to be a beryllium ceramic by the  
 21 print.  
 22 Q. Okay. But did it -- was it metalized? In  
 23 other words, did it have some metal on it?  
 24 A. Oh, yes. It had do, yeah, because it would

Page 57

1 go then to brazing.  
 2 Q. Before it went to brazing, did it already  
 3 have metal on it?  
 4 A. Yes, when I received it, it was already.  
 5 Q. Okay. What kind of metal was on it? Do  
 6 you know?  
 7 A. No idea.  
 8 Q. Did metal cover the whole surface of the  
 9 ceramic --  
 10 A. No.  
 11 Q. -- or was some of the ceramic exposed?  
 12 A. The top surface and the bottom surface of  
 13 the diameter would be exposed. Those were the  
 14 surfaces that needed sandblasting.  
 15 Q. Okay. You said it was three quarters of an  
 16 inch thick, and how big around?  
 17 A. Approximately -- I mean, I haven't seen one  
 18 in a long time. It could have been three quarters;  
 19 could have been an inch. I just knew it was the  
 20 largest beryllium ceramic that I had to deal with,  
 21 the largest piece that I had in ceramic.  
 22 Q. When you say -- what was the diameter of  
 23 the piece?  
 24 A. Oh, not small. I'm going to say --

Page 58

1 Q. Three inches?  
 2 A. Yeah, they're the biggest one I had to deal  
 3 with.  
 4 Q. Okay.  
 5 A. Sometimes they -- you know, if there was  
 6 spatter from the outside band, you had to sandblast  
 7 first before you put it down, you know, before you  
 8 assemble.  
 9 Q. Okay. What did you call that -- that round  
 10 piece of ceramic? Did it have a name?  
 11 A. A beryllium ceramic.  
 12 Q. Okay. That's not the window?  
 13 A. No.  
 14 Q. The window was what you actually made from  
 15 all the pieces, or was the window the ceramic  
 16 piece?  
 17 A. It -- say that one more time for me.  
 18 Q. Yeah. Was the term window used to describe  
 19 this round piece of ceramic, or was the window the  
 20 whole thing that you put together with the eight or  
 21 nine pieces?  
 22 A. The entire thing is a subassembly.  
 23 Q. Okay.  
 24 A. The ceramic window would be, I suppose, a

Page 59

1 ceramic window. I'm not really sure.  
 2 Q. So the round thing is called a window?  
 3 A. It may well be. I'm not -- I'm not sure.  
 4 We would just -- you would get a list. You would  
 5 pick up the parts, verify them per spec, assemble  
 6 it per spec, qualify it to pass.  
 7 Q. Mm-hmm.  
 8 A. And that's it.  
 9 Q. Do you know where Raytheon purchased the --  
 10 the round ceramic pieces that you were just  
 11 describing?  
 12 A. No idea.  
 13 Q. Were there other sizes and shapes of  
 14 beryllium oxide pieces that you worked with?  
 15 A. Definitely.  
 16 Q. Can you describe some of those for us?  
 17 A. Rectangle. Okay, um, I don't know; two and  
 18 a half, maybe. It was a rectangle and probably  
 19 inch, inch and a quarter wide by about, you know --  
 20 about that, about two -- I'm trying to think about  
 21 where it fit in the center of the other pieces, but  
 22 it was the only rectangle one I had to deal with.  
 23 You know, it was also thick, but it was the  
 24 rectangle.

Page 60

1 Q. What did you call that? That wasn't a  
 2 window? That was something else?  
 3 A. That was just the tall man assembly. We  
 4 just -- you got the beryllium ceramic and you  
 5 proceeded from there to assemble it.  
 6 Q. Okay. And -- okay. So we got the window,  
 7 the rectangle. What else?  
 8 A. There was -- sometimes you would get a  
 9 variety of little ones that would come through, but  
 10 we didn't have -- I didn't actually have to do an  
 11 assembly. I would just be asked to go sandblast  
 12 them. You know, somebody else would have been  
 13 handling the actual subassembly or whatever else  
 14 had to be done to them. You know, they may have  
 15 done something before, a welding job or something,  
 16 and they just asked me to go clean them up.  
 17 Q. Well, if the windows represented 80 percent  
 18 of the --  
 19 A. Right.  
 20 Q. -- stuff you worked with, what -- what  
 21 percentage would the rectangles represent?  
 22 A. There was only a few.  
 23 Q. Only a few of those?  
 24 A. Yeah, because I don't know if they were

Page 61

1 like remakes -- like say that they had got  
 2 something in that was out in the field or whatever  
 3 and they had to have a part made for it, so you  
 4 only had a few of those that you had to make and  
 5 then send them on their way. I don't know if they  
 6 -- it was somewhere down the line like in the  
 7 factory that they were used, so we just got a small  
 8 order of that, and the rest of my time was just  
 9 filled by people telling me to go sandblast certain  
 10 parts for them.  
 11 Q. Okay. And when they asked you to sandblast  
 12 these parts, would you know if the parts contained  
 13 beryllium or not?  
 14 A. Not always. Unless the blueprint came with  
 15 it, I wouldn't know.  
 16 Q. Does beryllium oxide ceramic look any  
 17 different from other kinds of ceramics that  
 18 Raytheon was using?  
 19 A. Not to me.  
 20 Q. What are some of the other kinds of  
 21 ceramics that were there in the --  
 22 A. They just would be little -- you'd just get  
 23 a box, a clear box that would have ceramics in it,  
 24 and they would ask you to sandblast them. I mean,



Page 62

1 it didn't seem -- didn't seem any different. Some  
2 had silver on the edges and some had copper on the  
3 edges, but I wouldn't be able to tell you the  
4 difference.

5 Q. You couldn't tell by looking at a -- unless  
6 you had the drawing, you couldn't tell by looking  
7 at a piece of ceramic what it was made out of?

8 A. No.

9 Q. And you often got parts containing some  
10 kind of ceramic; you were asked to sandblast these  
11 parts, but you didn't know what the parts were made  
12 out of?

13 A. Right.

14 Q. Did you ever see a -- a red tag at Raytheon  
15 that said contains beryllia; do not sandblast,  
16 grind, machine or abrade?

17 A. No.

18 Q. Did you ever see a red tag that said  
19 contains beryllia; dust and fumes are toxic?

20 A. No.

21 Q. In fact, no one at Raytheon ever told you  
22 that the dust and fumes of beryllia are toxic,  
23 correct?

24 A. No.

Page 63

1 Q. Let's talk about the -- well, actually, I  
2 guess I should have said at the beginning, if you  
3 ever want a break, feel free to ask for one. I  
4 know this is --

5 MR. HONIK: If you're going to shift  
6 topics, this might be a good time to take five  
7 minutes.

8 MR. UBERSAX: Yeah, why don't we do  
9 that. That's fine.

10 VIDEO OPERATOR: Going off the record,  
11 10:27 a.m.

12 (Off the record.)

13 VIDEO OPERATOR: On the record, 10:48  
14 a.m.

15 Q. (BY MR. UBERSAX) Ms. Genereux, you talked  
16 earlier about using a -- a file on some -- some of  
17 the parts you worked with. Did you also use  
18 sandpaper on any of these parts?

19 A. Occasionally.

20 Q. Okay. And can you tell us what you did  
21 with the sandpaper?

22 A. The same thing; you --

23 Q. Same thing you did with the file?

24 A. Right.

Page 64

1 Q. Okay. Would you actually be sandpapering  
2 beryllium oxide ceramic, or some metal that was  
3 covering the ceramic?

4 A. I don't believe that you sandbla-- that you  
5 filed or sanded the ceramic. I believe that it was  
6 whatever needed to be done on the diameter to fit  
7 it.

8 Q. And the diameter that you filed or  
9 sandpapered was made of a -- of some kind of a  
10 metal; is that right?

11 A. I believe so.

12 Q. And do you know what the metal was?

13 A. I really don't recall at which time, you  
14 know, which piece I'm doing.

15 Q. Did you sometimes have to sand or file  
16 beryllium copper?

17 A. Occasionally.

18 Q. But never beryllium oxide?

19 A. I wouldn't know.

20 Q. Well, as I understand it, you never  
21 actually filed or sandpapered a ceramic material;  
22 only metals?

23 A. Right. We sandblasted the ceramic.

24 Q. All right. Did you use something called a

Page 65

1 Drommel tool?

2 A. On occasion.

3 Q. Okay. What kind of tool is that?

4 A. It's like a little drill with a hard piece  
5 on the end.

6 Q. And what did you use that for?

7 A. If -- if it called for it being used to  
8 remove an excess burr or something on the material.  
9 It was tools used to bring them in tolerance.

10 Q. Did you use the Drommel tool on any ceramic  
11 material, or was that only on metals?

12 A. On metals.

13 Q. Did you sometimes use the Drommel tool on  
14 beryllium copper?

15 A. Could have been, yes.

16 Q. Okay. When you did that, would that create  
17 any -- any dust?

18 A. It always created something. Whenever  
19 you're using something, it would create some kind  
20 of dust.

21 Q. Did you perform any other operation on the  
22 pieces that you worked with in this lab that was  
23 abrasive or would cause some dust to be released?

24 A. Other than --



Page 70

1 holes into the box?

2 A. The very first machine?

3 Q. Yes.

4 A. The shield came up, so you went under like

5 a -- I don't know how you call that; just a shield

6 that came up, so your arms went underneath. It

7 wasn't actually drilled holes.

8 Q. Oh. So you lifted up the front of the

9 machine?

10 A. Mm-hmm.

11 Q. And how large was the space that was open?

12 A. Hmm. I would say maybe three feet by two

13 feet or 18 inches.

14 Q. Three feet wide?

15 A. The opening, you're saying?

16 Q. Yes.

17 A. Oh.

18 Q. The opening that you work -- that you put

19 your hands through.

20 A. Just whatever my arm -- it would come back

21 under my arm, so whatever my arm -- whatever

22 distance my arm took, so you know, that Plexiglas

23 would come back down.

24 Q. Did it come back down automatically, or did

Page 71

1 you have to lower the Plexiglas?

2 A. No, it kind -- it was loosely fitting, so

3 it would come down easy. It wasn't painful or

4 anything.

5 Q. Was there anything around your arms to make

6 the box airtight?

7 A. No, not that I can remember.

8 Q. So basically, what happened was you lift up

9 the front of the box --

10 A. Mm-hmm.

11 Q. -- and there would be an opening, say three

12 feet wide by a couple inches high, to get your arms

13 in?

14 A. Yeah.

15 Q. And that's a rectangular opening?

16 A. Yes.

17 Q. Was there some kind of exhaust ventilation

18 on the box to take the air away?

19 A. Not that I recall.

20 Q. How about --

21 VIDEO OPERATOR: One moment, please.

22 (Off the record.)

23 Q. (BY MR. UBERSAX) After the machine -- you

24 said after about a year, the machine was changed.

Page 72

1 And after the changes were made, was there exhaust

2 ventilation on the glove box?

3 A. I really don't recall seeing anything, I

4 mean, like anything particular.

5 Q. Well, when you were doing the sandblasting,

6 could -- what happened with the material, the sand

7 that was actually doing the cleaning? Where did it

8 go?

9 A. It would go through another hose to the

10 bucket where the original hose came up.

11 Q. Did anyone explain to you why the

12 sandblasting was done inside this glove box?

13 A. No. I just assumed that for the pressure

14 of the air gun.

15 Q. What do you mean by that?

16 A. Because you're sandblasting with air, and

17 whatever compound that's in there.

18 Q. Oh, so you understood that it was just to

19 keep the sand inside a -- inside the box?

20 A. Yeah.

21 Q. And you didn't have any understanding that

22 this was being used to protect you from any health

23 risk?

24 A. No.

Page 73

1 Q. And no one ever mentioned any health risk

2 in connection with this sandblasting of beryllium

3 oxide?

4 A. No.

5 Q. Okay. Did -- did any dust ever come out of

6 this glove box when you were doing the

7 sandblasting?

8 A. Yes.

9 Q. And where would it come out?

10 A. On my clothes, on my feet.

11 Q. Okay. Did it come out of the front of the

12 box?

13 A. Yes.

14 Q. And what did the dust look like?

15 A. White.

16 Q. And was it still the case after the machine

17 was changed and the gloves were attached to it that

18 dust would come out when you were sandblasting?

19 A. Yeah.

20 Q. The same amount of dust, or was it less

21 dust after the changes?

22 A. I would say somewhat less.

23 Q. Did you ever ask anyone at Raytheon about

24 what was in that dust?

Page 74

1 A. No.  
 2 Q. Did you ever talk with anyone at Raytheon  
 3 about the fact that dust was coming out of the  
 4 sandblasting operation?  
 5 A. No.  
 6 Q. Never complained about it?  
 7 A. Sometimes complained you're gritty all the  
 8 time, but that's about it.  
 9 Q. How many -- or how much of your workday,  
 10 typical workday would you spend in the sandblasting  
 11 room?  
 12 A. It varied, but you always spent a few hours  
 13 a day, and then towards shipping time or the end of  
 14 the month, you -- the last week and a half, you  
 15 probably spend your seven to eight hours, and then  
 16 sometimes they'd have overtime.  
 17 Q. How long did it take to sandblast a single  
 18 part?  
 19 A. That depended on how bad the part looked.  
 20 Q. Your average part would take how long?  
 21 A. Oh, could take 15, 20 minutes.  
 22 Q. Really? Oh. Did you ever have to evacuate  
 23 the sandblasting room?  
 24 A. Not that I recall.

Page 75

1 Q. Were you ever told to evacuate any work  
 2 area at Raytheon?  
 3 A. Later.  
 4 Q. Which work area was that?  
 5 A. Near the chem lab.  
 6 Q. The chem lab? Is that -- is that different  
 7 from the original lab you were working in?  
 8 A. Oh, yeah.  
 9 Q. Okay. Were you working in the chem lab  
 10 when this evacuation took place?  
 11 A. I had -- was in quality assurance. I was  
 12 inspecting parts coming from the chem lab.  
 13 Q. All right. And what was the cause of the  
 14 evacuation?  
 15 A. Could have been a number of reasons. If a  
 16 blower had gone down and there was chemicals or  
 17 whatever, then the alarm would go off and you were  
 18 asked to evacuate that area.  
 19 Q. Were you ever asked to evacuate from the  
 20 BWO lab?  
 21 A. No.  
 22 Q. How many times were you asked to evacuate  
 23 from the QA lab?  
 24 A. Offhand, I don't recall. Over the course

Page 76

1 of time, could have been about ten, maybe.  
 2 Q. Did anyone ever explain to you the reasons  
 3 for the evacuation?  
 4 A. We were just told that it was a precaution,  
 5 that a blower had gone down or -- you know, within  
 6 a few minutes, you would be going back in, so.  
 7 Q. Did anyone ever tell you that any of those  
 8 evacuations were being done because of possible  
 9 beryllium exposure?  
 10 A. No.  
 11 Q. Did you ever see any of the specifications  
 12 for the -- the beryllium oxide parts that Raytheon  
 13 was buying from outside vendors?  
 14 A. No.  
 15 Q. Did you ever see any of the specifications  
 16 for the products that Raytheon assembled with  
 17 beryllium oxide or beryllium copper pieces and then  
 18 sold to its customers?  
 19 A. Can you rephrase that, because I'm trying  
 20 to understand what you're --  
 21 Q. Yeah. Did you ever see any of the  
 22 specifications for the -- well, the subassemblies  
 23 that you were putting together?  
 24 A. Right. The blueprints?

Page 77

1 Q. The blueprints, sure.  
 2 A. That's all I seen, the blueprints.  
 3 Q. Okay. You did see those?  
 4 A. Blueprints for the particular  
 5 subassemblies.  
 6 Q. Okay. Do you know where those blueprints  
 7 came from?  
 8 A. Drafting.  
 9 Q. Were they -- were they given to Raytheon by  
 10 the U.S. government? Do you know?  
 11 A. Oh, I have no idea. I had a particular  
 12 blueprint.  
 13 Q. Did they ever have labels on them that  
 14 indicated that they were classified or from the  
 15 U.S. government or anything like that?  
 16 A. To the best of my knowledge, no.  
 17 Q. Okay. You just don't remember?  
 18 A. No. It -- I mean, it was basically the  
 19 actual part numbers and dimensions and what you had  
 20 to make sure that it was identified physically to  
 21 what I was building.  
 22 Q. Mm-hmm. Were there any U.S. government  
 23 personnel who were stationed at the Waltham plant?  
 24 A. I have no clue.

Page 78

1 Q. Was -- when you were working in the BWO  
2 lab, was a part of your job to clean up the lab?  
3 A. Yes.  
4 Q. And when would you do that?  
5 A. Come in the morning and hopefully before  
6 you go at night.  
7 Q. How did you clean it up?  
8 A. The benches would be cleaned with -- they  
9 had lint-free paper, you know, and acetone.  
10 Q. And when you would come in in the morning,  
11 would you see any dust on the surfaces in the lab?  
12 A. Yeah.  
13 Q. What -- what did you see?  
14 A. Just a white dust everywhere.  
15 Q. And what was the thickness of the dust on  
16 the surface?  
17 A. I wouldn't be able to tell you. I mean,  
18 just a dust, like if you looked at a table and saw  
19 it was dusty and it was time to Pledge it, to wipe  
20 it, same thing.  
21 Q. If you ran your finger across the surface,  
22 would it leave a mark?  
23 A. Yeah. Yes.  
24 Q. Did you ever talk to anybody about what

Page 79

1 that dust was made out of?  
2 A. I was just told that you wipe it up in the  
3 morning and you build your parts and then wipe your  
4 table before you go home and that's it.  
5 Q. And did anyone ever say that the dust might  
6 be hazardous?  
7 A. No.  
8 Q. Did you -- you didn't wear a mask or a  
9 respirator when you were cleaning up the room in  
10 the morning, did you?  
11 A. No.  
12 Q. Between your job in the -- in the BTO lab  
13 and the quality assurance lab -- the BWO lab;  
14 excuse me --  
15 A. Okay.  
16 Q. -- and the quality assurance, did you have  
17 any other job at Raytheon?  
18 A. Say that again. Between --  
19 Q. Yeah. Well, you've told us about two jobs  
20 you've had at Raytheon?  
21 A. Yes.  
22 Q. The first one in the BWO lab and the second  
23 one is toward the end of your time there in quality  
24 assurance?

Page 80

1 A. Right.  
2 Q. Was there any other job you did?  
3 A. Just the Northborough.  
4 Q. Just the Northborough? Okay. Were you  
5 ever doing something called production coil winder?  
6 Does that ring any bells?  
7 A. There was -- yeah, there was a short time.  
8 There was like a temporary layoff at one end; you  
9 filled in the gap by going to a different  
10 department.  
11 Q. So what did that involve, being a  
12 production coil winder?  
13 A. You -- it was such a short amount of time I  
14 was there. The time I was there it's just you  
15 pressed one pedal and it wound and then you pressed  
16 the other pedal and it stopped. There wasn't --  
17 Q. What was the -- what were the coils made  
18 out of?  
19 A. I haven't got a clue.  
20 Q. Was there any beryllium involved in that,  
21 as far as you know?  
22 A. No, not that I know of.  
23 Q. So that was just a short-term thing?  
24 A. Very short.

Page 81

1 Q. All right. Well, let's talk about the job  
2 in QA.  
3 A. Mm-hmm.  
4 Q. What exactly were you doing in that job?  
5 A. In process inspection.  
6 Q. Anything else?  
7 A. There were times that I would be placed on  
8 incoming inspection and sometimes final inspection.  
9 Q. All right. So -- well, let's take them in  
10 order. What is incoming inspection?  
11 A. There you would sit at a bench with a  
12 blueprint and verify the item had the same part  
13 number as the print.  
14 Q. Were you -- as an incoming inspector, were  
15 you receiving parts as they came to Raytheon from  
16 the outside vendors?  
17 A. They were coming in, but I mean, you got a  
18 certain amount of pieces.  
19 Q. Right. Were they in the packaging that the  
20 outside vendor sent them in?  
21 A. Not always.  
22 Q. Sometimes they were?  
23 A. Sometimes you went out there.  
24 Q. You went out where?

Page 102

1 ever see that or anything like it?

2 MR. HONIK: Object to the form of the

3 question.

4 A. No.

5 MR. UBERSAX: Well, what's the

6 objection?

7 MR. HONIK: Well, you're characterizing

8 it, you know, and it may be a label, and I

9 recognize that it says R-A-Y at the bottom, and I

10 don't mean to be hypertechnical about it, but

11 they're reproductions of something. We don't know

12 their date. We don't know their origin. So to the

13 extent that you characterize it in any way beyond

14 I'm handing you such and such an exhibit, that's my

15 objection.

16 MR. UBERSAX: Fine. I'll rephrase it,

17 then.

18 Q. (BY MR. UBERSAX) Have you ever seen a copy

19 of Exhibit 4 before?

20 A. No.

21 Q. Have you ever seen any document -- anything

22 like that in your years at Raytheon?

23 A. No.

24 Q. Did you ever see any -- any document that

Page 103

1 warned about any danger from any form of beryllium?

2 A. No.

3 Q. Did the blueprints that you worked with say

4 anything on them about beryllium?

5 A. Just when it called for a beryllium

6 ceramic, it would say either spelled out beryllium

7 or BE. That's the only reason that I even know

8 what it is.

9 (Exhibit 5 marked for identification.)

10 Q. All right. Exhibit 5 is Bates stamped GEN

11 372. Do you recognize that?

12 A. I don't recall it, no.

13 Q. You don't?

14 A. It's not a blueprint that I was privy to.

15 Q. It's not?

16 A. No.

17 Q. Okay. How do you know that?

18 A. Because I only had a couple of them that I

19 actually worked with.

20 Q. Okay. And that -- you see it says -- at

21 the top, it says title, insulator window?

22 A. There could have been -- some things were

23 called insulators, you know?

24 Q. And some things were called windows? Does

Page 104

1 this look to you like the window that you spent so

2 much of your time working with?

3 A. No. It has a through-hole in it, and we

4 didn't have -- the ones I did did not have

5 through-holes through them.

6 Q. Okay. At the bottom of the page, do you

7 see the little box where it says assembly contains

8 beryllia; control per provisions of Standard Number

9 37 dash 3066 dash 130?

10 A. Mm-hmm.

11 Q. Do see that? Was that little box with that

12 language on the drawings that you worked with?

13 A. I don't recall that.

14 Q. You've never seen that before?

15 A. No.

16 (Exhibits 6 and 7 marked for

17 identification.)

18 Q. Exhibit 6 is Bates stamped GEN 395 to 96.

19 Have you seen that before?

20 A. No, not like that.

21 Q. No? Do you see the -- the notes in note

22 three in particular where it says that exterior of

23 package shall contain a precautionary label

24 including instructions; do not open at receiving?

Page 105

1 A. I see it on here.

2 Q. Did you ever see that language on any of

3 the blueprints or drawings that you worked with?

4 A. Nothing that I worked with, no.

5 Q. Okay. All right. Now let's turn to

6 Exhibit 7, Bates stamped GEN 423. Is that a

7 drawing you've seen before?

8 A. I don't know for sure. This -- this isn't

9 the one I worked with. I don't know.

10 Q. Okay.

11 A. I have never seen this particular drawing

12 before.

13 Q. All right. Do you see there's a little box

14 in the middle of the page: Warning, this part is

15 beryllium oxide; hazardous; control per provisions

16 of Standard 37-3066-130?

17 A. I see it on here.

18 Q. Do you ever see that when you were at

19 Raytheon?

20 A. I don't recall seeing that.

21 Q. Well, when you worked at Raytheon, you had

22 no idea that beryllium oxide could be hazardous,

23 did you?

24 A. No.

Page 106

1 Q. When you were at Raytheon, did you ever  
2 learn that any other employee had had some kind of  
3 test, medical test relating to beryllium?

4 A. No.

5 Q. And I take it you never heard that a  
6 Raytheon employee had gotten a disease from  
7 beryllium?

8 A. No.

9 Q. Since you left in 1990, have you heard of  
10 any other Raytheon employee coming down with  
11 chronic beryllium disease?

12 A. No.

13 Q. Have you heard of any other Raytheon  
14 employee testing positive for sensitization to  
15 beryllium?

16 A. I had only heard that there were people who  
17 were going to go for tests. I haven't heard  
18 anything from anybody.

19 Q. Okay. Where did you hear that people are  
20 going for tests?

21 MR. HONIK: What's the source of your  
22 knowledge?

23 A. Well, when we got together --

24 MR. HONIK: If it's from your counsel

Page 107

1 --

2 A. Right.

3 MR. HONIK: All right. Well, that you  
4 can't share.

5 Q. (BY MR. UBERSAX) Okay. When you were  
6 working at Raytheon, did you ever develop any kind  
7 of a skin rash?

8 A. I had some like things like that on the  
9 nose, you know, like those bumps and stuff, but I  
10 didn't consider it to be anything -- like on my  
11 hands or anything, it was short-term, like they  
12 would get itchy, or -- but I don't -- I didn't --

13 Q. This was on your nose?

14 A. No. Well, like I always had some stuff on  
15 here, like these bumps, and I had things on my  
16 hands, but it was just like itchy, and these  
17 things, the only things that are left, that every  
18 so often they just bleed.

19 Q. You still get them long after leaving  
20 Raytheon?

21 A. No, just these here now, but the ones on my  
22 hands have pretty much gone away; just that they  
23 got itchy.

24 Q. Did you ever see a doctor about that when

Page 108

1 you were working for Raytheon?

2 A. No.

3 Q. So who was the first doctor that you talked  
4 to about working with beryllium at Raytheon?

5 A. Dr. Newman.

6 Q. Dr. Newman?

7 A. Well, excuse me. Let me rephrase that.

8 Dr. Ashley, when he had the test done, when  
9 National Jewish sent him the test kit, he said it  
10 was a VELPT test, and he had said did you ever work  
11 with it? And I said well, I knew some parts I had  
12 had beryllium in them because it said so on the  
13 print.

14 Q. Okay. So this conversation happened after  
15 the test results were already back?

16 A. Well, they have to take the blood first.

17 Q. Okay. When they took the blood, did you  
18 talk to Dr. Ashley?

19 A. He called me to tell me it was positive.

20 Q. Well, did you talk to Dr. Ashley about  
21 beryllium before the test results came back?

22 A. Just when I had told him that I had worked  
23 with it, before they took the blood.

24 Q. Before they took the blood? And was that

Page 109

1 in his office where you had this conversation?

2 A. Yes.

3 Q. Did he ask you questions about your work  
4 with beryllium?

5 A. No.

6 Q. What did you tell him about your work with  
7 beryllium?

8 A. Just that I knew that I sandblasted with  
9 beryllium.

10 Q. And was it -- was this conversation with  
11 Dr. Ashley on the same day that they drew the blood  
12 to send it off to be tested?

13 A. I don't recall if it was the same day. It  
14 may have been the week before they ordered the kit.

15 Q. Okay. So it was either -- it was either  
16 before they drew the blood or the same day that  
17 they drew the blood, right?

18 A. It could well have been somewhere in that  
19 time frame.

20 Q. Well, to the best of your recollection, was  
21 this conversation with Dr. Ashley either before or  
22 on the same day as they drew the blood to send it  
23 off to National Jewish?

24 A. To the best of my recollection, I talked to



Page 210

1 test report which is --  
 2 MR. HONIK: You want to look at the  
 3 June 23rd, '01 LPT?  
 4 MR. WYMAN: Yes. A copy of it was  
 5 produced at RAY 000307, and you have a copy of it  
 6 over there that you put in front of the witness?  
 7 MR. HONIK: Yes.  
 8 MR. WYMAN: Okay. I have another copy  
 9 here, if you want to keep yours.  
 10 MR. HONIK: It doesn't matter. She's  
 11 got it.  
 12 Q. (BY MR. WYMAN) Do you recognize that  
 13 document, Mrs. Genereux?  
 14 A. Yeah.  
 15 Q. What do you recognize it to be?  
 16 A. It's the first result of the beryllium test  
 17 that came back.  
 18 Q. Okay. And do you have a recollection that  
 19 that test was performed in June of 2001?  
 20 A. I see the date on here, and it was more  
 21 than likely the first one.  
 22 Q. Okay. Do you have a recollection of any of  
 23 the conversations that you had with Dr. Newman's  
 24 office prior to that time, if any?

Page 211

1 A. Just the fact that they were sending a kit  
 2 down.  
 3 Q. Mm-hmm. And do you recall how long in  
 4 advance of having that first test done that they  
 5 sent that kit down?  
 6 A. Not very long in advance. Not long after  
 7 she got it, they called me at the lab.  
 8 Q. Okay. And that was at Dr. Ashley's office?  
 9 A. Yes.  
 10 Q. Okay. So the sequence was you communicated  
 11 with them in 2001. Did you call them, or did they  
 12 call you, or --  
 13 MR. HONIK: I'm sorry. Who's them?  
 14 MR. WYMAN: The National Jewish  
 15 Hospital, Dr. Newman's facility.  
 16 MR. HONIK: Okay.  
 17 Q. (BY MR. WYMAN) Do you recall how you first  
 18 made contact with them? Was it a telephone call,  
 19 was it a letter, or --  
 20 A. No, I -- I called them.  
 21 Q. Okay. And do you have any recollection of  
 22 who you talked to?  
 23 A. Heather Davis.  
 24 Q. Okay. And did you talk to her more than

Page 212

1 one time before they sent out the test kit?  
 2 A. No, I don't believe so.  
 3 Q. Okay. Do you have any way of pinpointing  
 4 the date of that conversation?  
 5 A. No.  
 6 Q. Now, is there anything that occurred  
 7 between your communications with the Department of  
 8 Labor when you had that request for benefits which  
 9 was denied and the communication with Dr. Newman?  
 10 Were there any other communications that you had  
 11 with anybody else in between --  
 12 MR. HONIK: Object to the form of the  
 13 question.  
 14 Q. (BY MR. WYMAN) -- with respect to your  
 15 breathing problems or beryllium?  
 16 MR. HONIK: Excuse me. Object to the  
 17 form of the question.  
 18 A. Can you --  
 19 Q. (BY MR. WYMAN) Too much?  
 20 A. Yeah.  
 21 Q. Okay. Let me try to break it down into  
 22 pieces.  
 23 A. Okay.  
 24 Q. You had communications with the Department

Page 213

1 of Labor and they turned down your application for  
 2 benefits, correct?  
 3 A. Not at this time.  
 4 Q. That was before, wasn't it?  
 5 A. No.  
 6 MR. HONIK: Object to the form of the  
 7 question.  
 8 Q. (BY MR. WYMAN) Okay. Which -- let's go  
 9 back to the Department of Labor for just a second.  
 10 Let me try to get the time down, okay?  
 11 A. Yes.  
 12 Q. That happened before you had your first  
 13 test at the National -- from the National Jewish  
 14 Hospital?  
 15 MR. HONIK: Object to the form of the  
 16 question.  
 17 Q. (BY MR. WYMAN) Am I right?  
 18 A. My conversation with Department of Labor  
 19 happened before this.  
 20 Q. Yes.  
 21 A. But not the -- not the DOE thing.  
 22 Q. Oh, okay. Okay.  
 23 A. There's -- sorry. It's Department of Labor  
 24 who told me National Jewish.



Page 214

1 Q. Okay. They're the ones who told you to  
2 call out there?  
3 A. Right.  
4 Q. That's what I was trying to get. Did they  
5 specific -- did you discuss specifically beryllium  
6 or beryllium disease as a possibility with anybody  
7 at the Department of Labor?  
8 A. I really don't understand what you're  
9 asking me.  
10 Q. Do you -- when you spoke with the  
11 Department of Labor and they recommended that you  
12 call the National Jewish Hospital --  
13 A. Right.  
14 Q. -- did they tell you why they wanted you  
15 to call the National Jewish Hospital?  
16 A. They asked me if I had worked with anything  
17 with beryllium.  
18 Q. Mm-hmm. Okay. And did you respond?  
19 A. Yes.  
20 Q. You said yes?  
21 A. Yes.  
22 Q. And that's what caused you to place a  
23 telephone call to the National Jewish Hospital; is  
24 that correct?

Page 215

1 A. Correct.  
2 Q. And sometime shortly after that call, they  
3 sent you the test kit --  
4 A. Correct.  
5 Q. -- that -- the results of which are  
6 reflected on the document that's in front of you  
7 right now; is that correct?  
8 A. Yes.  
9 MR. WYMAN: I would like to mark a copy  
10 of that document and we can either have it be my  
11 copy or your copy, Mr. --  
12 MR. HONIK: Your copy, please.  
13 MR. WYMAN: -- as the next exhibit,  
14 which is number 9, I believe.  
15 (Exhibit 9 marked for identification.)  
16 Q. (BY MR. WYMAN) So that communication that  
17 you had with the Department of Labor where they  
18 asked you about whether you were exposed to  
19 beryllium anywhere and you said yes --  
20 A. Mm-hmm.  
21 Q. -- and they suggested you call the  
22 National Jewish Hospital happened sometime weeks  
23 before this particular test kit arrived and then  
24 was sent back to generate the results on Exhibit 9;

Page 216

1 is that correct?  
2 MR. HONIK: Object to the form of the  
3 question.  
4 A. To the best of my knowledge.  
5 Q. (BY MR. WYMAN) Okay. And that's all you  
6 can give me, and thank you for that.  
7 If you were to try to get a copy of the  
8 assembly drawings that you were using while you  
9 were at Raytheon for the parts that were involved  
10 in the sandblasting operation you were working on,  
11 how -- how would you describe those drawings to  
12 help somebody try to locate the right drawings for  
13 you?  
14 (Witness gesturing.)  
15 Q. What's your best -- do you have any  
16 recollection of the numbers that might have been on  
17 them?  
18 A. No, I have no idea.  
19 Q. The names?  
20 A. The only one I knew of was ARCO, because it  
21 was on the print.  
22 Q. And it said ARCO on the print?  
23 A. A-R-C-O.  
24 Q. A-R-C-O? Anything else that you can

Page 217

1 remember about it at all that might be on the print  
2 to help us to identify it?  
3 A. Just the bottom flange, top flange,  
4 beryllium ceramic, end bosses.  
5 Q. Those are the things that you would  
6 associate with the drawing that would help to  
7 identify it, if we could find it?  
8 (Witness gesturing.)  
9 A. There was a sleeve, too. I'm sorry.  
10 Q. And a sleeve?  
11 A. That the bosses go into.  
12 Q. Okay. Were there a lot of revisions on  
13 this drawing, on these drawings, or you don't  
14 remember that?  
15 A. I have no idea.  
16 Q. Okay. And you didn't know any of the  
17 people who were involved in the preparation of the  
18 drawing either?  
19 A. No.  
20 Q. Okay. Do you have any symptoms or things  
21 that have happened to you that you associate with  
22 the beryllium disease that you believe you have?  
23 A. Yes.  
24 Q. Could you tell me what they are?

Page 254

1 a civil lawsuit in Rhode Island?  
 2 A. No, I don't.  
 3 Q. Do you know what court had jurisdiction  
 4 over that part of Rhode Island?  
 5 A. No, I don't.  
 6 Q. Okay. Any other claims or lawsuits other  
 7 than what we've mentioned so far?  
 8 A. Not to my knowledge.  
 9 Q. Was the Workers Compensation claim that you  
 10 recently resolved the only Workers Compensation  
 11 claim you've ever filed?  
 12 A. Yes.  
 13 Q. And the disability claim for long term  
 14 disability, is that the only long term disability  
 15 claim you ever filed?  
 16 A. I believe so, yes.  
 17 Q. And in terms of SSDI benefits, you've only  
 18 applied for those one time; is that right?  
 19 A. Yes.  
 20 Q. Do you remember who recommended that you  
 21 treat with Dr. Walters?  
 22 A. I believe it -- to the best of my  
 23 knowledge, it was Dr. Yearwood.  
 24 MR. AHERN: That's all I have. Thanks.

Page 255

1 MR. HONIK: Any more from anyone else?  
 2 MS. LINDEMANN: Yeah, I'm going to ask  
 3 some questions. Do you want me to wait?  
 4 MR. HONIK: Go right ahead.  
 5 CROSS-EXAMINATION  
 6 Q. (BY MS. LINDEMANN) Hi, Mrs. Genereux. I'm  
 7 Frances Lindemann, and I'm the lawyer for Hardric  
 8 Industries. And I'm sorry to be last and having to  
 9 ask you questions, but I'm really interested in the  
 10 period of time from 1982 to 1990 and your work at  
 11 Raytheon.  
 12 A. Mm-hmm.  
 13 Q. So if we can go back there a little bit. I  
 14 understood you saying that you only worked with  
 15 basically two assembly drawings, the ARCO and the  
 16 tall man?  
 17 A. Right.  
 18 Q. Does that mean that you were on two  
 19 projects during that eight years?  
 20 A. Those were the two main things that I had  
 21 to do.  
 22 Q. And so basically, it was sort of an  
 23 assembly line process where you had a particular  
 24 part or component that you would put together, and

Page 256

1 then you'd hand it on to someone else?  
 2 A. Right. Then it would go off somewhere  
 3 else.  
 4 Q. Okay. And I've read a description in -- I  
 5 think it was probably in Colorado -- of you working  
 6 with windows?  
 7 A. That's what they called beryllium. The  
 8 ceramic was called the window, you know.  
 9 Q. Okay. And was that ARCO or tall man?  
 10 A. They were both called windows.  
 11 Q. Okay. So they were both windows?  
 12 A. Yeah, that's just the name that they used  
 13 to call them.  
 14 Q. Okay. Were there different windows in the  
 15 ARCO and in the tall man? I mean, the windows was  
 16 the piece, the beryllium oxide piece?  
 17 A. Right.  
 18 Q. Okay. And what size were they, roughly,  
 19 the ones that you worked with?  
 20 A. ARCO was a diameter rather large and thick,  
 21 where the tall man was a rectangle, and it was  
 22 thick, but it was rectangle and -- you know, off  
 23 the top of my head, to remember exactly how big, I  
 24 would say like this and probably this wide.

Page 257

1 Q. Okay. And when you say thick, can you show  
 2 me with your fingers?  
 3 A. Well, ARCO was your thicker, so I'm going  
 4 to estimate it to be approximately like this.  
 5 Q. Okay.  
 6 A. And the other one was a little thicker,  
 7 because you know, it -- you had like different  
 8 steps, you know?  
 9 Q. Now, the only time that you actually  
 10 created dust with those beryllium oxide pieces, was  
 11 that when you were sandblasting?  
 12 A. Right.  
 13 Q. And the description that you made of  
 14 working on a window and putting it in copper or  
 15 some other metal and brazing it --  
 16 A. Right.  
 17 Q. -- was that both tall man and ARCO?  
 18 A. Right.  
 19 Q. Do you know what they were used for  
 20 ultimately?  
 21 A. No.  
 22 Q. You said that those two projects were what  
 23 you worked on primarily?  
 24 A. Right.

Page 258

1 Q. Can you recall any other projects?  
 2 A. I'd be given small pieces and asked to  
 3 weld, take this little piece and weld it on to that  
 4 one, just spot weld it, you know. So you would go  
 5 and you might weld 25 of them, and you didn't have  
 6 anything to work with; you just welded them. It  
 7 could have been used for somebody else to continue  
 8 it on.  
 9 Q. Was that beryllium?  
 10 A. I don't know. I didn't get anything except  
 11 told exactly -- one person would show you how to do  
 12 it, and then you would repeat the process for as  
 13 many as there were.  
 14 Q. With the tall man and with the ARCO, was  
 15 your process the same of putting it together where  
 16 you would put -- do the brazing, put them in the  
 17 metal, and all the -- and put in the flanges? Were  
 18 they the same design except for different shapes?  
 19 A. I'm going --  
 20 Q. If you can describe?  
 21 A. If I can correct you on it --  
 22 Q. Yeah.  
 23 A. I believe it to be similar. You had  
 24 various materials being put together. You aligned

Page 259

1 them. Some pieces -- like the bosses had to be  
 2 welded on first. You know, you would clean that  
 3 and then you would put the Eutectic or whatever  
 4 brazing compound they needed. You would load it  
 5 into a stainless steel grained fixture. This  
 6 fixture would go on to brazing. A day or two  
 7 later, you would get the fixture back. And another  
 8 person would check for leaks or holes in the  
 9 soldering or the brazing. And when it passed that  
 10 person, you would get it back and it would need to  
 11 be cleaned up, brushed, looked for defects on it  
 12 and then it went on.  
 13 Q. And that was true with regard to both ARCO  
 14 and tall man?  
 15 A. Right, just different fixtures, different  
 16 sizes.  
 17 Q. In a week, what would be the average number  
 18 of units you would make? Or work on; excuse me.  
 19 A. Every week was so different. It really  
 20 varied depending on how difficult it was. If you  
 21 had pieces that you really had to work and file to  
 22 fit to get them in that specification, you would  
 23 spend more time with it.  
 24 Q. But would it be, say, one one week and ten

Page 260

1 another week --  
 2 A. Oh, no.  
 3 Q. -- sometimes or would it be --  
 4 A. You would -- I'm going to say you could  
 5 easily probably average ten ARCO's to completion  
 6 every week, and by the end of the week, you would  
 7 do a massive final sandblasting for shipping.  
 8 Q. Okay. How many years of that time period  
 9 did you work on the ARCO project, do you think?  
 10 A. From beginning until I left to QC.  
 11 Q. Okay. And how many years did you work on  
 12 the tall man?  
 13 A. Oh, that didn't come into play until maybe  
 14 after a year or so after I was in the lab, when  
 15 they were sure I wasn't going to screw up on it.  
 16 Q. So was tall man more complex?  
 17 A. Yes.  
 18 Q. And how many, an average, would you guess  
 19 that you made of those a week when you worked on  
 20 them?  
 21 A. My best, probably four or five.  
 22 Q. What would you say your average was?  
 23 A. Three.  
 24 Q. Did either of these projects incorporate

Page 261

1 tubing -- you know, circular tubes -- in any way?  
 2 A. No.  
 3 Q. Only one more.  
 4 A. Mm-hmm.  
 5 Q. As you sit here and you think about all the  
 6 dust, the dust I've heard in the -- in the bench  
 7 area and sandblasting and at home, was it similar  
 8 dust? Would you recall it as being the same kind  
 9 of dust?  
 10 A. Somewhat similar. I mean, what I had at  
 11 home would be in my smock pockets. Back then, we  
 12 wore pants with cuffs; in your cuffs of your pants,  
 13 you know, and it definitely was the stuff that I  
 14 was sandblasting with or sandblasting.  
 15 Q. So it was the same color in all three  
 16 places?  
 17 A. Oh, yeah.  
 18 Q. And it was white?  
 19 A. Right. White.  
 20 Q. Okay. No more questions. Thank you.  
 21 REDIRECT EXAMINATION  
 22 Q. (BY MR. UBERSAX) I just have a couple,  
 23 then we'll get out of here. Did either the tall  
 24 man or the ARCO include helical rods?

Page 262

1 A. No.  
 2 Q. No? And did you ever hear the expression  
 3 matchsticks when you were working at Raytheon?  
 4 A. No.  
 5 Q. Do you recognize the name Steven Donaghey,  
 6 D-O-N-A-G-H-E-Y?  
 7 A. If it's the one I'm thinking of, tall,  
 8 white-haired guy, that's as far as I could tell  
 9 you.  
 10 Q. Was he your department manager?  
 11 A. No, not that I -- I mean, not that I know.  
 12 He may well have been, but not that I'm aware of,  
 13 you know.  
 14 Q. You have no recollection of Mr. Steven  
 15 Donaghey approving a request by Al Broadbent that  
 16 you receive a security clearance for access to  
 17 Department of Defense information?  
 18 A. No.  
 19 Q. No? Let me show you this document --  
 20 A. Yeah.  
 21 Q. -- which is RAY 2564. Why don't we mark  
 22 that. We'll make it an exhibit, too.  
 23 (Exhibit 11 marked for identification.)  
 24 Q. That doesn't refresh your recollection?

Page 263

1 A. No. I had a plain blue badge like  
 2 everybody else.  
 3 Q. Okay. Were there some people who had  
 4 badges that indicated --  
 5 A. Some had red backgrounds. My husband had a  
 6 red background.  
 7 Q. Did that mean that he had a security  
 8 clearance?  
 9 A. Yes.  
 10 Q. And were there other colors besides red?  
 11 A. Some people had a bar on top, but we didn't  
 12 question. I mean, some of them just had a little  
 13 bar thing on top.  
 14 Q. Okay.  
 15 A. I mean, mine just had a typical blue  
 16 background.  
 17 (Exhibit 12 marked for identification.)  
 18 Q. Exhibit 12 is RAY 2588, record of employee  
 19 training. I have been trained as required by the  
 20 hazardous communications standard, name, signature.  
 21 Have you seen that before?  
 22 A. I don't recall it, but --  
 23 Q. Is that your signature on the page?  
 24 A. Looks like it.

Page 264

1 Q. Okay. Did you receive some training from  
 2 Raytheon in hazard communications?  
 3 A. Not that I was aware of.  
 4 Q. Do you recall any kind of a meeting where a  
 5 Raytheon employee made a presentation to the  
 6 assembled group about health and safety risks?  
 7 A. No.  
 8 Q. And it's -- it's clear to you that you  
 9 didn't receive any training from Raytheon that  
 10 related in any way to beryllium, correct?  
 11 A. Not to beryllium, no. If anything, the  
 12 only thing -- unless it had to do with the welders,  
 13 like the argon welding is the only thing I can -- I  
 14 don't -- I mean, I did some welding for a little  
 15 while. They had like a closet they had transferred  
 16 into a welding station, and I got to wear one of  
 17 them shields and learn how to weld without burning  
 18 my finger.  
 19 Q. Have you lived in the same house since  
 20 1997?  
 21 A. Yes.  
 22 Q. Why did you move into the house that you're  
 23 now in?  
 24 A. Because it was -- because it was easier for

Page 265

1 me to get around. I had a tri-level. This is a  
 2 one-level.  
 3 Q. And was it the side effects of the stroke  
 4 or the after-effects of the stroke that caused you  
 5 to move into this new house?  
 6 A. At the time, it was one year from my stroke  
 7 and I had two young children.  
 8 Q. What's different about the new house, the  
 9 1997 house?  
 10 A. What's different?  
 11 Q. Yeah, what's different about the new house  
 12 from the old house that makes it easier for you?  
 13 A. I get to do laundry.  
 14 Q. Oh. How is that?  
 15 A. Because the other one, the washer was in  
 16 the basement.  
 17 Q. Oh, okay.  
 18 A. But other than that, it's home. It's one  
 19 floor.  
 20 Q. Do you -- okay. Is laundry one of the  
 21 chores that you now do around the house?  
 22 A. Oh, yeah.  
 23 Q. All right. Thanks. Those are all the  
 24 questions I have.

C E R T I F I C A T E

Page	Line	Correction
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George A. Henshaw

Dated this 23 day of March, 2006.